

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Francis Kamundia Kariuki Debtor	Case No.: 21-10268-pmm
Fay Servicing, LLC as Servicer for LSF9 Master Participation Trust, Movant	Chapter: 13
v.	Judge: Patricia M. Mayer
Francis Kamundia Kariuki Scott F. Waterman – Trustee, Respondents	Hearing Date: December 7, 2021 at 10:00 am Objection Deadline: December 2, 2021

**NOTICE OF MOTION FOR RELIEF FROM
AUTOMATIC STAY**

Fay Servicing, LLC as Servicer for LSF9 Master Participation Trust has filed a Motion for Relief from Stay with the Court in order to gain Court authority to foreclose on real property known as 4037 Freemansburg Ave, Easton, PA 18045.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before December 2, 2021 (14 days after the date the notice was mailed) you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of Court
United States Bankruptcy Court
Eastern District of Pennsylvania
The Gateway Building
201 Penn Street, Suite 103
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Jonathan Schwalb, Esquire
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on the 7th day of December 2021, at 10:00 A.M., at United States Bankruptcy Court, The Gateway Building, 201 Penn Street, 4th Floor, Reading, PA 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Dated: November 18, 2021

By: /s/ Jonathan Schwalb
Jonathan Schwalb, Esq.
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TO:

Trustee

Scott F. Waterman (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Debtor's Counsel

John R.K. Solt, Esquire
John R. K. Solt, P.C.
Gateway Professional Center
2045 Westgate Drive, Suite 404B
Bethlehem, PA 18017

U.S. Trustee

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

Debtor

Francis Kamundia Kariuki
4037 Freemansburg Ave
Easton, PA 18045